

MEMO ENDORSED

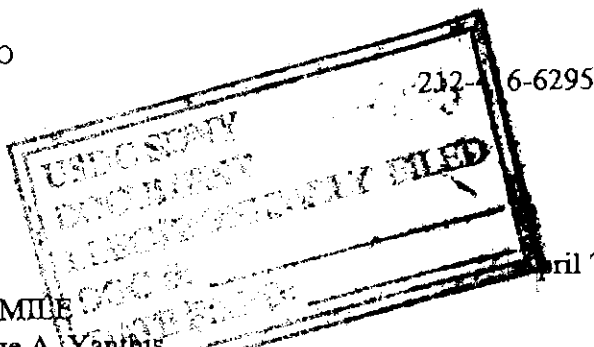


STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL

SO ORDERED:

George A. Yanthis
Hon. George A. Yanthis
United States Magistrate Judge. 4/10/08

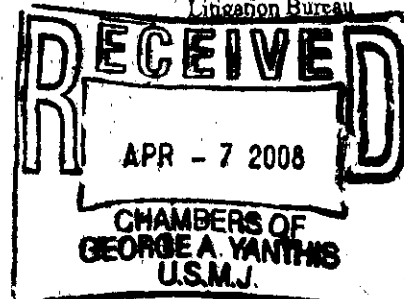
ANDREW M. CUOMO
Attorney General



BY FACSIMILE
Hon. George A. Yanthis
United States District Court
Southern District of New York
300 Quarropas Street, Rm. 118
White Plains, New York 10601

LESLIE G. LEACH
Executive Deputy Attorney General
Division of State Counsel

JUNE DUFFY
Assistant Attorney General in Charge
Litigation Bureau



Re: Tornello v. Sanders, 07 Civ. 4064 ((CLB)(GAY))

Dear Judge Yanthis:

I represent the defendant in the above-referenced matter. The current discovery deadline in this case is April 15, 2008 for fact discovery and April 30, 2008 for expert depositions. On consent, the parties respectfully request that the discovery deadline in this case be extended until May 30, 2008 for the completion of all discovery. This is the second request for an extension of the discovery deadline in this case.

An extension of discovery is necessary because defendant is waiting to receive an additional release from plaintiff for plaintiff's medical records in order to conduct expert discovery. Defendant is also waiting for documents which support plaintiff's claim for monetary damages for lost wages. We will be able to provide the Court with an update on our discovery during the telephone conference with the Court which has been scheduled for April 21, 2008 at 9:00 a.m.

Wherefore, the parties respectfully request that the discovery deadline be extended to May 30, 2008.

Respectfully submitted,

Maria Barous Hartonilis
Maria Barous Hartonilis
Assistant Attorney General

cc: Jonathan Lovett, Esq.
Counsel for Plaintiff - By Facsimile